

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

DAWN M. JENKINS,)
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)
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Plaintiff,)
)
)
v.) CIVIL ACTION NO. 1:12-CV-10622-WGY
)
AFNI, INC.; DIVERSIFIED CONSULTANTS, INC.; EQUIFAX INFORMATION SERVICES, LLC; EXPERIAN INFORMATION SOLUTIONS, INC.,)
)
)
)
Defendants.)
)

**DECLARATION OF BRIAN J. OLSON IN SUPPORT OF EQUIFAX INFORMATION
SERVICES LLC'S RESPONSE TO PLAINTIFF MOTION TO DEEM FACTS
ADMITTED**

I, Brian J. Olson, hereby declare as follows:

1. I am over the age of 21, and have personal knowledge of the facts set forth herein, and those facts are true and correct. If called to testify, I could and would testify competently hereto.
2. I am an attorney with the law firm of King and Spalding LLP in Atlanta, Georgia, representing Equifax Information Services LLC ("Equifax") in the above-captioned action. I submit this declaration in support of Equifax's Memorandum in Response to Plaintiff's Motion to Compel. This declaration is submitted based upon my personal knowledge and review of the pleadings and other records in this case.
3. On October 4, 2012, Plaintiff served 75 requests for production of documents on Equifax by U.S. Mail and Equifax responded to the requests.

4. On January 12, 2013 at 1:41 a.m., Plaintiff emailed Equifax's counsel and included a copy of the Requests for Admission.

5. Plaintiff never served a copy of the Requests for Admission upon Equifax by regular mail and Equifax never agreed to accept service of the Requests by email.

6. Plaintiff made no effort to meet and confer with Equifax or its counsel, as required by the Federal Rules of Civil Procedure and the Local Rules of this Court, prior to filing the Motion.

Pursuant to 28 U.S.C. §1746, I further declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of March, 2013, at Atlanta, Georgia.

By: /s/ Brian J. Olson
Brian J. Olson